

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff,

v.

Civil Action No. 3:20-cv-00710-FDW-DSC

BLUEWORKS CORPORATION,  
BLUEWORKS INNOVATION  
CORPORATION, NINGBO C.F.  
ELECTRONIC TECH CO., LTD.;  
NINGBO YISHANG IMPORT AND  
EXPORT CO., LTD.

Defendants.

**JOINT MOTION TO EXTEND DEADLINE TO FILE A MOTION FOR LEAVE TO  
JOIN ADDITIONAL PARTIES OR OTHERWISE AMEND THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 7.1, Plaintiff Hayward Industries, Inc.’s (“Hayward”) and Defendants Blueworks Corporation, Blueworks Innovation Corporation, Ningbo Yishang Import and Export Co., Ltd. (“Ningbo Yishang”), and Ningbo C.F. Electronic Tech Co., Ltd. (“Ningbo C.F.”), by and through their counsel, hereby jointly move to amend this Court’s deadline for the parties to file a motion for leave to join additional parties or otherwise amend the pleadings from September 15, 2021 (Dkt. 42 ¶ 3(a)) to September 29, 2021. The parties believe that good cause exists to allow Ningbo Yishang and Ningbo C.F. time for their recently hired counsel to evaluate amendments to the pleadings. Additionally, Plaintiff Hayward has recently filed objections (Dkt. 50) to the Magistrate’s order (Dkt. 49) denying Plaintiff’s Motion for Protective Order (Dkt. 43). Accordingly, Hayward has

not answered any discovery in the case thus far, and currently its discovery responses are not due until after the current deadline to amend the pleadings. The proposed two-week extension will not cause any party to be prejudiced and will not unduly delay the current schedule.

Date: September 14, 2021

Respectfully submitted,

/s/ Erik Paul Belt

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Date: September 14, 2021

/s/ Shaobin Zhu

/s/ Brooks F. Jaffa

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***Attorneys for Defendants Ningbo Yishang Import  
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Date: September 14, 2021

/s/ Michael R. Houston

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and Blueworks Innovation Corporation***

**CERTIFICATE OF SERVICE**

I hereby certify that on September 14, 2021 the foregoing document was filed with the clerk of this Court via the CM/ECF system and was served on all counsel of record.

/s/ Shaobin Zhu

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Shaobin Zhu